UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 22 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 8992
RETURN RECEIPT REQUESTED

Mr. John Weber
Vice President
Adelman's Truck Parts Corporation
2000 Waynesburg Road Southeast
Canton, Ohio 44707

Re: Notice of Violation
Compliance Evaluation Inspection
OHD987014594

Dear Mr. Weber:

On August 6, 2015, representatives of the U.S. Environmental Protection Agency and Ohio Environmental Protection Agency inspected Adelman's Truck Parts Corporation located in Canton, Ohio (hereinafter "ATP," "facility," or "you"). As a generator of hazardous waste and used oil, ATP is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* ("RCRA"). The purpose of the inspection was to evaluate ATP's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste and used oil. A copy of the inspection report is enclosed for your reference.

Based on information provided by ATP, EPA's review of records pertaining to ATP, and the inspector's observations, EPA has determined that ATP violated RCRA requirements related to hazardous waste determinations, used oil and universal waste, as described in paragraphs 1 – 7, below:

1. Hazardous Waste Determination

Under Ohio Admin. Code § 3745-52-11 [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous.

At the time of the inspection, ATP had not determined whether certain wastes it was generating in its Rebuild and Maintenance shop were hazardous wastes. These waste streams included paint booth filters and waste purge solvent from paint spraying operations, parts blasting grit from resurfacing operations, and waste aerosol cans.

On September 5, 2015, ATP emailed EPA indicating that it was in the process of making waste determinations for these items. Until such determinations are made, ATP remains in violation of the above requirement.

2. Labeling of Used Oil Containers and Tanks

Under Ohio Admin. Code § 3745-279-22(C)(1) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection, several containers storing and accumulating used oil at ATP's site were not labeled as "Used Oil." These included several 5-gallon buckets in Building #3 of ATP's Engine Department, two 55-gallon drums, two 5-gallon buckets and smaller containers in Building #4 of ATP's Engine Department, and a plastic tote at ATP's outdoor disassembly pad. Additionally, a small aboveground tank at the southern entrance of Building #4 of the Engine Department was not labeled as "Used Oil." ATP, therefore, was in violation of the above requirement.

On September 5, 2015, ATP contacted EPA indicating it had developed new policies to ensure its tanks and containers are labeled properly. However, ATP did not provide any additional documentation (e.g., photographs) to indicate that the above issues have been corrected. ATP, therefore, remains in violation of the above requirement.

3. Response to Releases of Used Oil

Under Ohio Admin. Code § 3745-279-22(D) [40 C.F.R. § 279.22(d)], a generator of used oil shall do the following in response to a release of used oil to the environment: 1) stop the release, 2) contain the released used oil, 3) clean up and manage properly the released used oil and other materials, and 4) if necessary, repair or replace any leaking used oil storage containers or tanks prior to returning them to service.

At the time of inspection, spills of used oil were observed in several areas around ATP:

- Used oil had drained outside an eastern exit of the Rebuild and Maintenance Shop and accumulated in an unlined ditch. Soil along the length of the ditch appeared to be stained with oil. No efforts to contain or clean the release were observed.
- In the Engine Department's Building #3, oil-soaked absorbent material was observed on the ground around a used oil storage area. No efforts to remove the oil-soaked material were observed.
- Outside the south side of the Engine Department's Building #4, a large oil stain was observed underneath a damaged steel dumpster. No efforts to contain or clean the release were observed.

- At the outdoor disassembly pad, oil-stained soil was observed near a plastic tote that had been accumulating used oil. Used oil had also accumulated in the containment grates surrounding the disassembly pad. No efforts to contain or clean the releases were observed.
- At the outdoor disassembly yard, several large stains of oil were observed on the soil and gravel in the area. No efforts to contain or clean the release were observed.

On September 5, 2015, ATP provided photographs that display the cleanup of certain areas outlined above. These areas include the ditch outside the Rebuild and Maintenance Shop, the containment grates at the outdoor disassembly pad, and the stains observed on the ground at the outdoor disassembly yard. However, the photographs did not display any corrective actions taken to clean up the oil-soaked absorbent observed in the Engine Department's Building #3, the oil-stained soil near the steel dumpster outside the Engine Department's Building #4, or the oil-stained soil adjacent to a used oil tote at the outdoor disassembly pad. ATP, therefore, failed to properly respond to releases of used oil and remains in violation of the above requirements.

4. Universal Waste Labeling Requirements

Under Ohio Admin. Code § 3745-273-14(E) [40 C.F.R. § 273.14(e)], a small quantity handler of universal waste lamps must label or clearly mark each lamp or a container or package in which lamps are stored with any one of the following phrases: "Universal Waste – Lamp(s)," "Waste Lamp(s)" or "Used Lamp(s)."

At the time of inspection, ATP was accumulating several dozen universal waste lamps in Building #3 of its Engine Department. Some of the lamps were placed in cardboard boxes for storage while other lamps were not containerized. Neither the lamps nor the boxes storing the lamps were labeled with one of the phrases above. ATP, therefore, was in violation of the above requirement.

On September 5, 2015, ATP provided a document that displayed the shipment of all waste lamps from its site on August 28, 2015. Thus, no further action is necessary so long as ATP maintains compliance with the above requirement.

5. Universal Waste Dating Requirements

Under Ohio Admin. Code §§ 3745-273-15(A) and (C)(1)-(6) [40 C.F.R. §§ 273.15(a) and (c)(1)-(6)], a small quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste was generated. The handler of universal waste must be able to demonstrate the length of time that the universal waste has been accumulated since the date it became a waste. The handler may make this

demonstration by, among other things, labeling the container in which the universal waste accumulates with the earliest date that any universal waste in the container became a waste.

At the time of inspection, ATP was accumulating several dozen universal waste lamps in Building #3 of its Engine Department. Some of the lamps were placed in cardboard boxes for storage while other lamps were not containerized. Neither the lamps nor the containers in which the lamps were stored were dated with the date the universal waste lamps were generated. ATP was also unable to present documentation related to previous shipments of universal waste lamps. ATP, therefore, was unable to demonstrate the length of time it had been accumulating universal waste.

On September 5, 2015, ATP provided a document that displayed the shipment of all waste lamps from its site on August 28, 2015. Thus, no further action is necessary so long as ATP maintains compliance with the above requirement.

6. Universal Waste Storage Requirements

Under Ohio Admin. Code § 3745-273-13(D)(1) [40 C.F.R. § 273.13(d)(1)], a small quantity handler of universal waste must contain universal waste lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.

At the time of inspection, ATP was accumulating several dozen universal waste lamps in Building #3 of its Engine Department. Some of the lamps were placed in cardboard boxes for storage while other lamps were not containerized. Many of the containers in which the lamps were stored were open, and many lamps were not stored in a way that was adequate to prevent breakage under reasonably foreseeable conditions. ATP, therefore, was in violation of the above requirements.

On September 5, 2015, ATP provided a document that displayed the shipment of all waste lamps from its site on August 28, 2015. Thus, no further action is necessary so long as ATP maintains compliance with the above requirement.

7. Management of Spent Lead-Acid Batteries

Under Ohio Admin. Code § 3745-273-13(A)(1) [40 C.F.R. § 273.13(a)(1)], a small quantity handler of universal waste batteries that manages spent lead-acid batteries as universal waste under Ohio Admin. Code chp. 3745-273 must place any battery that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions in a container. The container must be closed,

structurally sound, compatible with the contents of the battery, and must lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. Alternatively, a facility that collects or stores spent lead-acid batteries prior to on or off-site reclamation may elect to manage its batteries under Ohio Admin. Code § 3745-266-80.

At the time of inspection, ATP was storing several pallets of automotive batteries in its Transmission and Axle Department (Building #5). ATP representatives stated these batteries are removed from incoming vehicles and later taken off site for reclamation. At least one battery observed in the area was leaking acid onto the ground during the inspection, and ATP had not taken corrective measures to contain the battery or clean up the spill. ATP, therefore, failed to properly manage its spent lead-acid batteries.

After the inspection, as documented in a September 5, 2015 email to EPA, you took certain actions to establish compliance with the above hazardous waste, used oil, and universal waste requirements. Your email did not contain sufficient information on the actions you may have taken to establish compliance for the hazardous waste, used oil, and universal waste requirements outlined in paragraphs 1, 2, 3 and 7, above. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraphs 1, 2, 3, and 7. You should submit your response to Mr. Brian Kennedy, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Kennedy, of my staff, at (312) 353-4383 or at kennedy.brian@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Frank Zingales, Ohio EPA (frank.zingales@epa.ohio.gov)
Teri Finfrock, Ohio EPA (teri.finfrock@epa.ohio.gov)

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 5, Land and Chemicals Division
RCRA Branch, LR-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

COMPLIANCE EVALUATION INSPECTION REPORT

INSPECTION DATE:	August 6, 2015
SITE NAME:	Adelman's Truck Parts Corporation
ADDRESS:	2000 Waynesburg Road Southeast Canton, Ohio 44707
EPA ID NUMBER:	OHD987014594
GENERATOR STATUS:	Conditionally Exempt Small Quantity Generator
NAICS CODE:	423120 Motor Vehicle Supplies and New Parts Merchant Wholesalers
FACILITY CONTACT:	John Weber Vice President
EPA INSPECTOR:	Brian Kennedy Environmental Engineer Compliance Section 2 RCRA Branch Land and Chemicals Division

PREPARED BY: Brian Kennedy — Date: 9/10/2015

APPROVED BY: Julie Morris, Chief, Compliance Section 2 — Date: 9/16/15

Purpose of Inspection

An unannounced Compliance Evaluation Inspection ("CEI") of Adelman's Truck Parts Corporation (hereinafter "ATP" or "facility") located at 2000 Waynesburg Road Southeast, Canton, Ohio took place on August 6, 2015. The CEI was conducted by U.S. Environmental Protection Agency and Ohio Environmental Protection Agency ("OEPA") personnel and was an evaluation of the facility's compliance with certain provisions of the Resource Conservation and Recovery Act ("RCRA") and its implementing regulations found in the Ohio Administrative Code and the Code of Federal Regulations. More specifically, the CEI was an evaluation of ATP's compliance with the regulations governing generators of hazardous waste.

Participants

The following persons were present for part or all of the inspection:

John Weber – Vice President	ATP
Frank Zingales – Environmental Specialist	OEPA
Brian Kennedy – Environmental Engineer	U.S. EPA

Introduction

I arrived on site at 9:00 AM EST with Frank Zingales of the OEPA. We entered the main office and requested to see an environmental coordinator. Shortly thereafter Mr. John Weber, ATP's Vice President, arrived and escorted us to his office for an opening conference. I presented Mr. Weber my enforcement officer credentials and business card and provided the Small Business Resource and Pollution Prevention information sheets. I described the purpose of the U.S. EPA RCRA inspection and the process by which I would conduct the inspection, including a site tour that would involve photographs of hazardous waste storage areas as well as a review of ATP records pertaining to hazardous waste. Mr. Weber provided a summary of the site operations.

I informed Mr. Weber of ATP's right to make a confidential business information claim over the information and documents collected during the inspection.

Site Description

The following information about ATP is based on personal observations of the EPA inspector and on representations made during the inspection by facility personnel identified above or within the text unless otherwise specified.

ATP specializes in the salvage and domestic and international sale of medium and heavy duty truck parts. ATP purchases trucks from individuals, commercial fleets, the military, and other businesses. Trucks are placed in ATP's large outdoor storage lot which extends several acres east of its 2000 Waynesburg Drive location and main office. In the center of this large outdoor storage area, ATP conducts disassembly operations in which heavy machinery and shears are used to break down larger trucks, trailers and other vehicle components. ATP also operates smaller disassembly areas where workers manually take apart and repair truck components. This is done in both a smaller outdoor area and several production and maintenance buildings. Salvageable parts are then sorted, cataloged and placed in indoor storage centers for later sale at

ATP or across the street at Adelman's Truck Sales (2001 Waynesburg Drive Southeast). Adelman's Truck Sales does not conduct the heavy duty disassembly that is done at ATP. Some of the parts that ATP stores for sale include engines, transmissions, differentials, tires, and radiators. ATP originally opened in the 1950's and currently has 32 employees.

ATP drains the fuel, coolant, hydraulic fluid, and oil from incoming trucks and also removes their batteries. Fuel is drained into a tanker truck which takes the fuel off site to Heritage Crystal Clean. Drained coolant is accumulated in buckets, drums or totes. Certain coolants are recycled on-site through a filter to remove particulates and the pH is checked before reuse. Other coolants are sent off site for disposal. Used oil is drained into drums, totes, and in-ground tanks in certain buildings. Heritage Crystal Clean also removes ATP's used oil. ATP has specialized equipment to remove the Freon in its trucks, which is then transferred off site to USA Refrigerant, a Freon distributor. The batteries removed by ATP are shrink-wrapped on pallets and shipped off-site for recycling, although some are sold by ATP for reuse. ATP recently finished construction of a new fluids recovery building which will be used to drain fluids and remove batteries from incoming trucks in one centralized area. The building will be equipped with outdoor storage tanks to accumulate all drained fluids.

Other wastes generated by ATP include sludge and cleaning fluid that accumulates in its parts washers. ATP operates a large parts washer that removes the sludge and oil that builds up on truck parts with a water-based cleaner. This sludge is drummed and shipped offsite as non-hazardous waste. ATP also operates a small paint booth for touch up jobs. The paint sprayer gun is occasionally purged with xylene after use. This waste xylene is then consolidated with the parts washer sludge in the same drum. Aerosol cans are generated on site, but are not managed as hazardous waste. Some are managed as scrap metal while others are disposed with general refuse. Universal waste lamps generated from various buildings are stored in the engine storage area prior to shipment off site.

ATP had notified in 1991 as a small quantity generator of D001, F003, and F005 hazardous waste, but has not re-notified since. Besides the small quantities of xylene that are generated from painting operations, no other process on ATP's site regularly generates a hazardous waste.

Site Tour

Mr. Weber led the tour through ATP. The tour started at the Rebuild and Maintenance shop (referred to as Building #2), where ATP workers conduct parts cleaning, painting and repair. We spoke with several employees inside the shop about their work. We viewed a large parts washer in the shop, which was essentially a large steel compartment over a liquid collection reservoir. An ATP employee opened the compartment and pointed out the accumulated cleaning fluid and sludge inside. There appeared to be oily fluid leaking from the parts washer and draining east outside the shop to an unlined drainage ditch. Oily fluid had accumulated in the outdoor ditch (See Photo 1 in Attachment A: Inspection Photographs). Along the length of the ditch the soil appeared stained with oil (See Photo 2). The ditch appeared to carry stormwater north to a storm sewer. The ATP employee said the fluid was likely from a spill of oily fluid that occurred a month prior, and estimated the volume was 10-15 gallons. Sludge from the parts washer is periodically removed and placed in a nearby 55-gallon drum (See Photo 3). ATP manages this sludge as non-hazardous waste and it is taken off site by Tier Environmental. Liquid from the

parts washer is placed in separate drums and taken off site by Heritage Crystal Clean, also as non-hazardous waste. We spoke with the same ATP employee about waste aerosol can management. He stated some cans are thrown in the garbage while others are placed in scrap metal containers.

Continuing through the Rebuild and Maintenance Shop, Mr. Weber pointed out a small blasting chamber for resurfacing parts. Under the chamber was a small container accumulating blasting grit. Mr. Weber said the grit was managed as non-hazardous waste, but that it had not been evaluated to determine if it may be a hazardous waste. At a small paint spray station, we spoke with an ATP employee about how the paint sprayers are cleaned. The employee stated the sprayers are occasionally purged with xylene and pointed to a small (< 1 gallon) open plastic container on the counter that contained waste xylene. The container was not labeled. The employee stated that the waste xylene is eventually poured into the drum accumulating parts washer sludge in Photo 3.

Mr. Weber led the tour to ATP's Engine Department (Building #3) just east of the Rebuild and Maintenance Shop. ATP was storing dozens of engines that had been removed from its trucks. There was a centralized used oil storage area in this building that contained a 500-gallon storage tank, two 55-gallon drums, and several buckets of used oil. Some of the buckets were open and unlabeled (See Photo 4). The tank and drums were labeled as "Used Oil." There was oil-soaked absorbent material on the ground around the tank. I observed a nearby fire extinguisher. The label said the extinguisher had been serviced by Interstate Fire in June of 2015.

The tour continued to a second, smaller engine building (Building #4) east of Building #3, where more engines and related components were being stored. There was used oil storage area near a hydraulic oil storage tank that contained two 55-gallon drums and several buckets and containers. The drums and containers were not labeled as "Used Oil" (See Photo 5). There was a small used oil storage tank near the southern entranceway to the building (See Photo 6). The tank was not labeled as "Used Oil." There was a containment grate along the south entranceway of the building that ties into ATP's stormwater sewer system (See Photo 7). We observed a catch basin outside this building. This section of the stormwater collection system drains to an outfall at Sherrick Run, a small stream that runs along southern boundary of ATP.

The site tour continued east past Building #4's southern entrance. Mr. Zingales pointed out an old dumpster that appeared to have leaked used oil onto the ground. There was oil stained soil around the dumpster, which had a large opening at its base (See Photo 8). We continued east to a covered outdoor disassembly area. There were two ATP employees working in the area. The disassembly area was a concrete pad with containment sumps around its western and southern edges. There was a tote in the area that was accumulating a mixture of used oil and other automotive fluid. The tote was not labeled. It appeared the drain at the base of the tote had been opened and oil had spilled onto the ground (See Photo 9). Stormwater and used oil had accumulated in the containment sumps around the concrete pad (See Photo 10). These sumps are blind and do not tie into ATP's stormwater drainage system.

Mr. Weber next led the tour to ATP's new fluids recovery building, a large drive-through garage in which incoming trucks will have their batteries and automotive fluids removed. Mr. Weber

said several tanks will be placed outside the south side of the building to store these fluids. The building was empty except for two totes of used antifreeze and empty 55-gallon drums. There were containment sumps built into the floor of the building.

The tour continued further east into ATP's large outdoor storage areas. Mr. Weber said ATP plans to extend pavement into these areas, but all storage and disassembly activities past this point are done on bare ground (with gravel). We approached a large disassembly and shearing area where ATP uses heavy equipment to destroy large truck components and trailers down to scrap. There were numerous oil stains on the ground in this area (See Photos 11 and 12). Mr. Weber explained that even though most fluids are drained from vehicles before they get to this point, some residual fluids still leak onto the ground. Mr. Zingales and I explained that spills of used oil should be cleaned up as soon as possible.

Mr. Weber led the tour west back towards ATP's production buildings. The last building we toured was the Transmission and Axle department (Building #5), which is near the new fluids recovery building. ATP stores its recovered transmission and axle components in this building, as well as automotive batteries and certain waste streams. Inside the west end of the building, Mr. Weber pointed out two in-ground used oil tanks under steel grating. ATP places components on these grates for used oil to drain away. There was used oil in the tanks during the inspection (See Photo 13). Heritage Crystal Clean periodically removes the oil from these tanks. In the center storage aisle of the building ATP was storing dozens of automotive batteries on wooden pallets (See Photo 14). At least one battery appeared to be leaking and the area smelled like acid (See Photo 15). These batteries are shipped off site as scrap to the Harris Battery Company. In the aisle south of these batteries ATP was storing several 55-gallon drums. There were several drums of oily parts washer water (See Photo 16), a drum full of parts washer sludge dated 6/19/2015 (See Photo 17), a full drum marked as non-hazardous waste but with no other details (See Photo 18), and another full drum that was not marked or labeled. It was unclear if these last two drums contained solid or liquid waste.

Mr. Zingales and I requested to see the eastern portion of ATP's site, which is primarily used to store newly acquired trucks prior to processing. Mr. Zingales and I followed Mr. Weber as he drove around the perimeter of the eastern storage yards. There were hundreds of trucks parked these areas. No waste was observed in these areas and there did not appear to be any oil staining on this portion of the property.

Mr. Weber led us back the main office to review records. After reviewing some ATP documents, we discussed any universal waste that ATP may accumulate on site. Mr. Weber said waste lamps were kept in the Engine Department. Mr. Weber led us back to Building #3 to view the lamps. ATP had accumulated approximately one dozen vertical boxes of waste fluorescent lamps (See Photo 19), as well as a larger open box that was accumulating more lamps (See Photo 19). None of the boxes appeared to be labeled or dated.

Record Review
The following documents were reviewed:

- ATP's stormwater pollution prevention plan, which showed several outfalls into Sherrick Run and another stream, Ruddick Ditch, which borders the north side of ATP's property
- TCLP metals laboratory report for the parts washer sludge and related profile sheet from Tier Environmental, which determined the material to be non-hazardous waste
- A non-hazardous waste manifest for the parts washer sludge, which displayed its shipment to a non-hazardous landfill for disposal by Tier Environmental
- Sales receipts for the automotive batteries picked up by Harris Battery Company
- Sales receipts for the used oil picked up by Heritage Crystal Clean, including the oily water from the parts washer, as well as diesel fuel

We requested to also see shipment documents related to universal waste. Mr. Weber was unable to produce these documents during the inspection.

We discussed ATP's stormwater pollution prevention plan and how ATP has conducted monitoring at its outfalls. After the records review, Mr. Weber led us to ATP Outfall 3 into Sherrick Run. From a bridge passing over Sherrick Run, Mr. Weber pointed to the area where the outfall was located. The outfall was not visible due to overgrowth in the area. There did not appear to be any oil in the water. A map of ATP which displays the stormwater management system is in Attachment B.

Closing Conference
I summarized my review of the site and potential issues to Mr. Weber. These issues included:

- Tanks and containers that store used oil must be labeled as "Used Oil"
- The numerous oil spills observed on site, and how they must be cleaned up expeditiously and disposed of properly
- Hazardous waste determinations should be completed for the blasting grit in the maintenance shop, as well as aerosol cans and paint booth filters
- The mixing of xylene waste with the non-hazardous parts washer sludge in the maintenance shop
- Labeling, dating, and proper storage of universal waste lamps

Mr. Weber did not make any confidential business information claims during the inspection.

The inspection ended at 12:30 PM.

Attachments
A. Inspection Photographs
B. Stormwater Management Map
C. Inspection Checklists

ATTACHMENT A: Inspection Photographs

Photographs were taken by Brian Kennedy using a Canon PowerShot A2400 IS Digital Camera.

RCRA Photo Log

Photo	Description	Time (CST)
1	Oil in the ditch outside the eastern edge of the Rebuild and Maintenance Building.	8:55 AM
2	Oil-stained soil in the ditch outside the eastern edge of the Rebuild and Maintenance Building.	8:55 AM
3	A drum accumulating parts washer sludge and waste xylene inside the Rebuild and Maintenance Building.	8:59 AM
4	A used oil collection and storage area inside the Engine Department (Building #3).	9:10 AM
5	A used oil collection and storage area inside the Engine Department (Building #4).	9:16 AM
6	A used oil storage tank inside Building #4.	9:16 AM
7	A collection grate along the southern edge of Building #4 which ties into the stormwater management system.	9:17 AM
8	A dumpster that appeared to have spilled used oil near the area outside Building #4.	9:25 AM
9	A tote of used oil that appeared to have spilled at the covered outdoor disassembly area.	9:29 AM
10	Stormwater and used oil had collected in the grates which run along the concrete pad at the outdoor disassembly area.	9:31 AM
11	A large oil stain on the soil at the large outdoor shearing area.	9:40 AM
12	Another large oil stain on the soil at the large outdoor shearing area.	9:41 AM
13	Used oil accumulating in the drainage pits (tanks) inside the Transmission and Axle Building (Building #5).	9:50 AM
14	Dozens of automotive batteries on wooden pallets in Building #5.	9:52 AM
15	A battery in Building #5 that appeared to be leaking acid.	9:53 AM
16	Several drums of oily parts washer water in Building #5.	9:57 AM
17	A full drum of parts washer sludge in Building #5.	9:57 AM
18	A full drum labeled as non-hazardous waste. It was unclear what waste was being stored in this drum.	9:57 AM
19	Many boxes of universal waste lamps in the Engine Department.	10:44 AM
20	A large open box accumulating universal waste lamps in the Engine Department.	10:44 AM

Photo 1:

Photo 2:

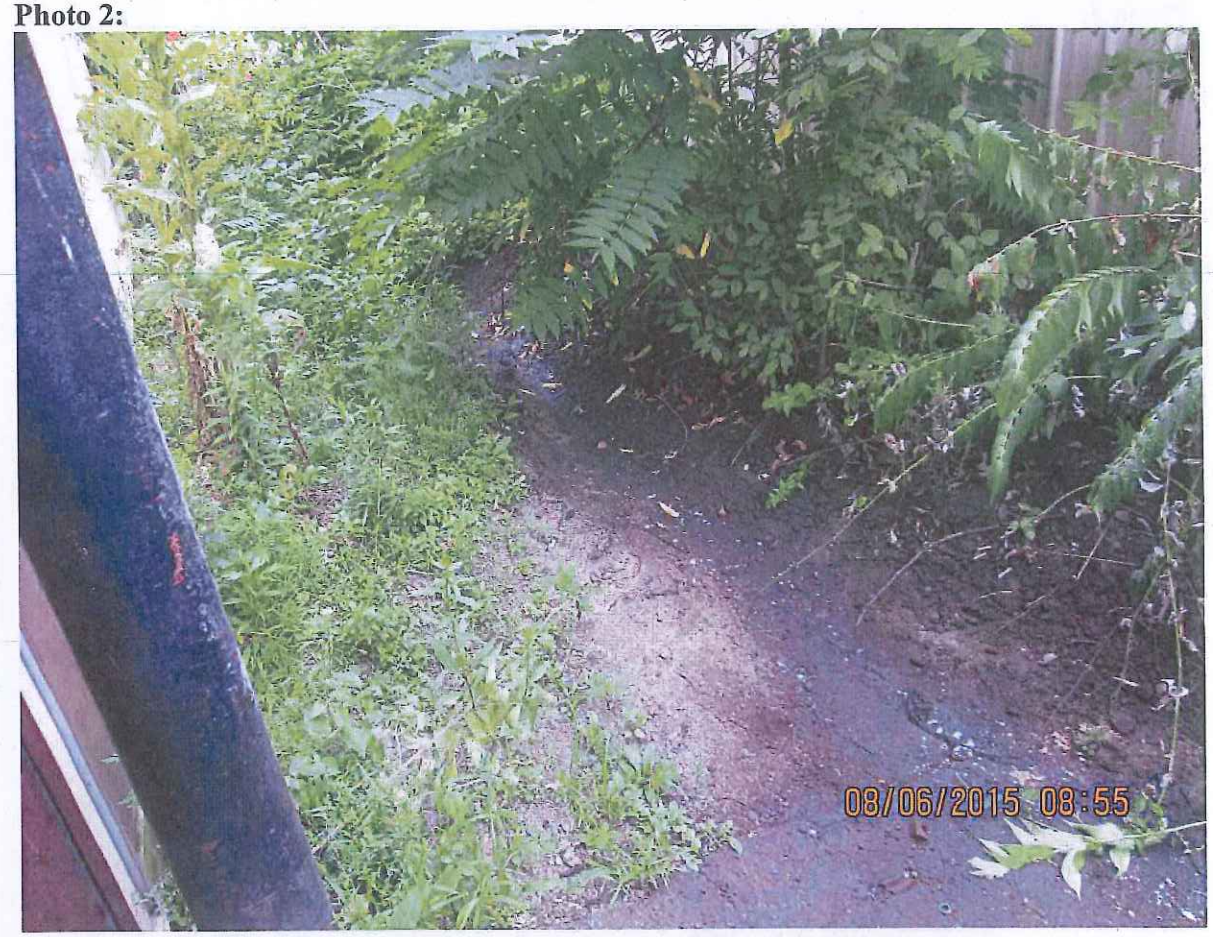


Photo 3:

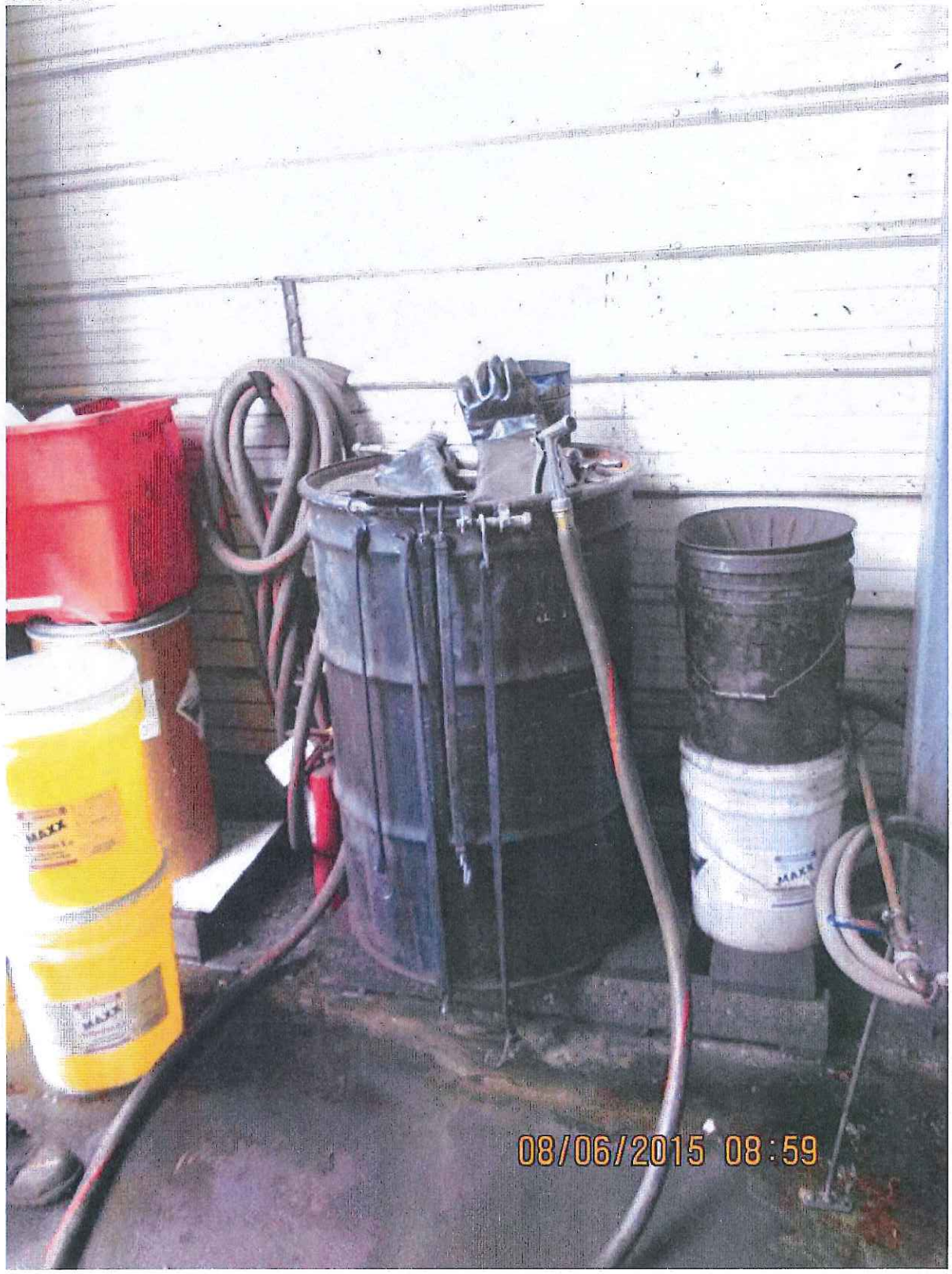


Photo 4:

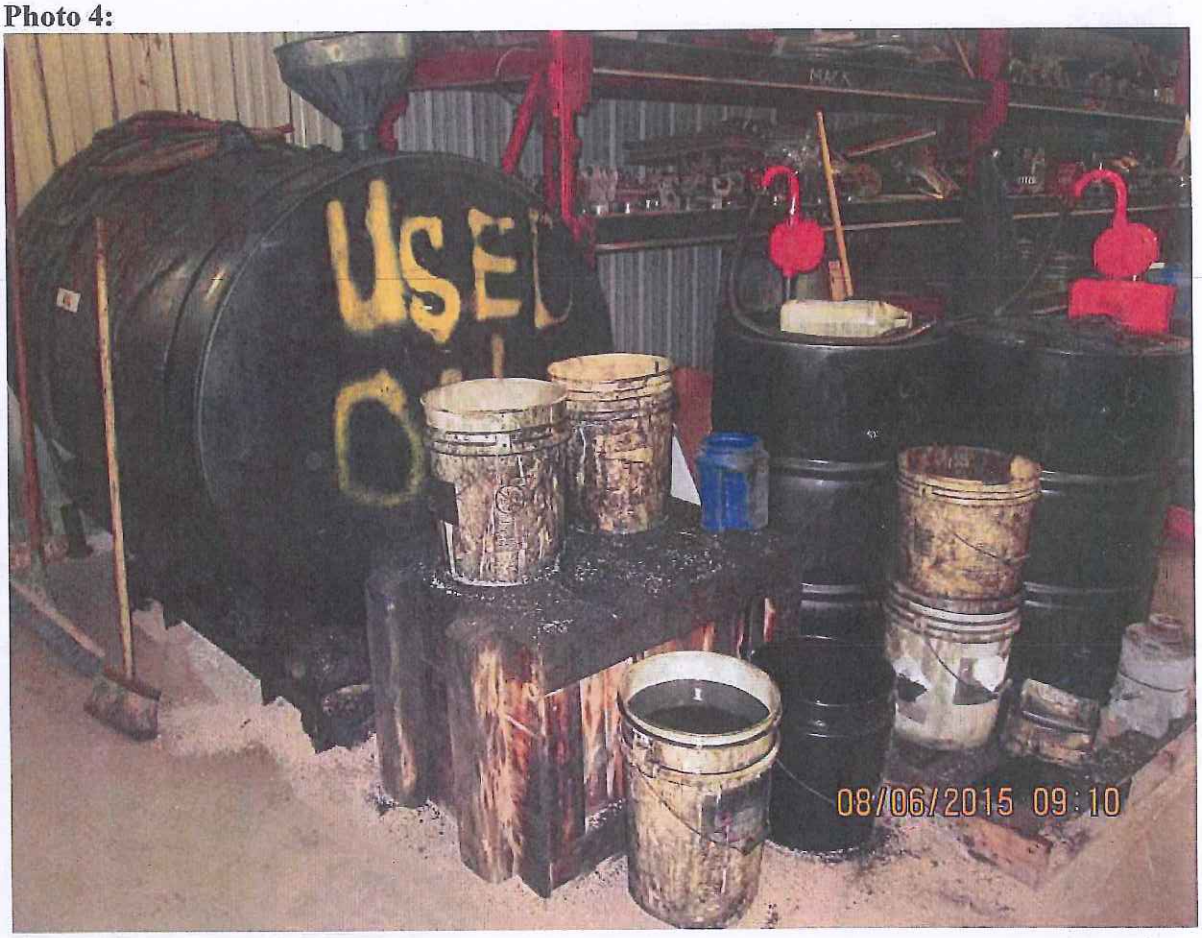


Photo 5:

Photo 6:

Photo 7:

Photo 8:

Photo 9:

Photo 10:

Photo 11:

Photo 12:

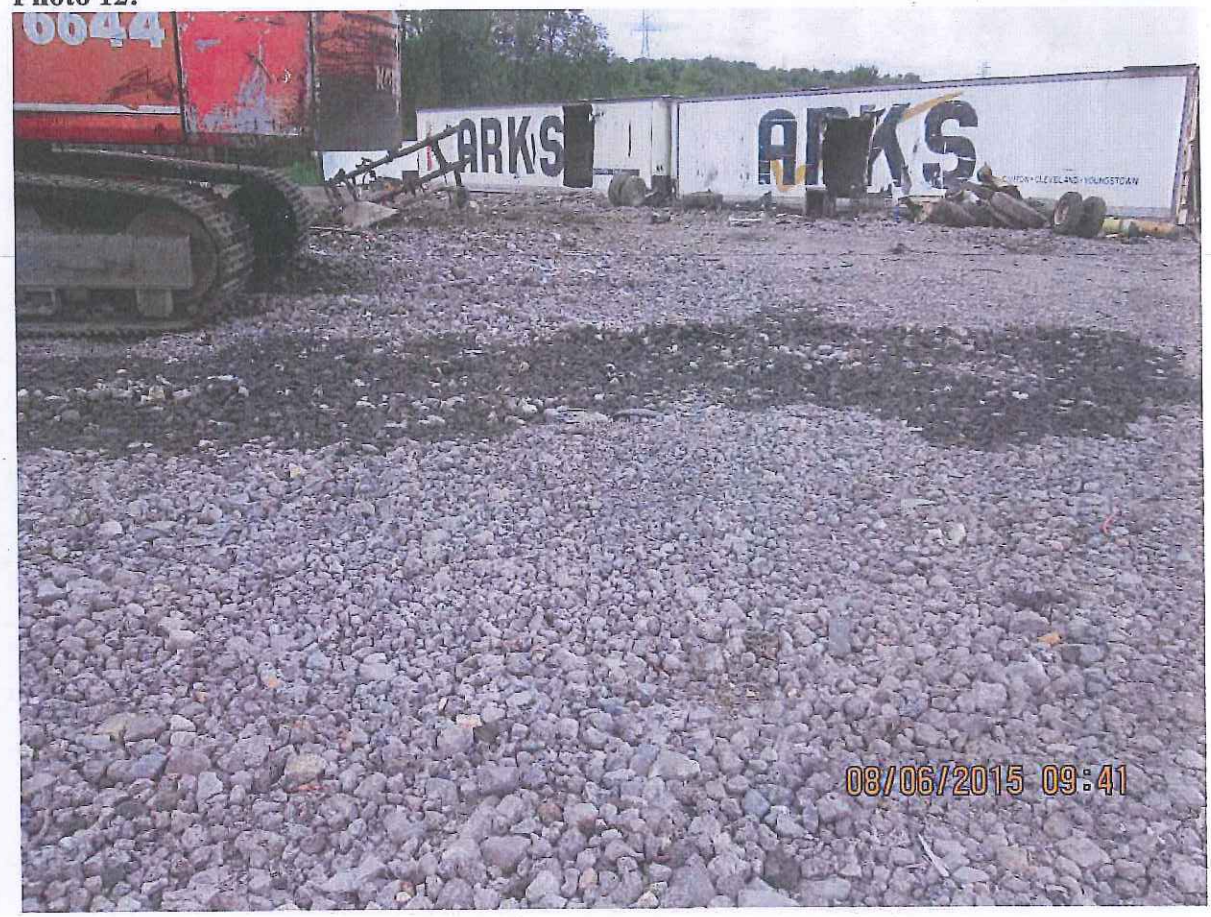


Photo 13:

Photo 14:

Photo 15:

Photo 16:

Photo 17:

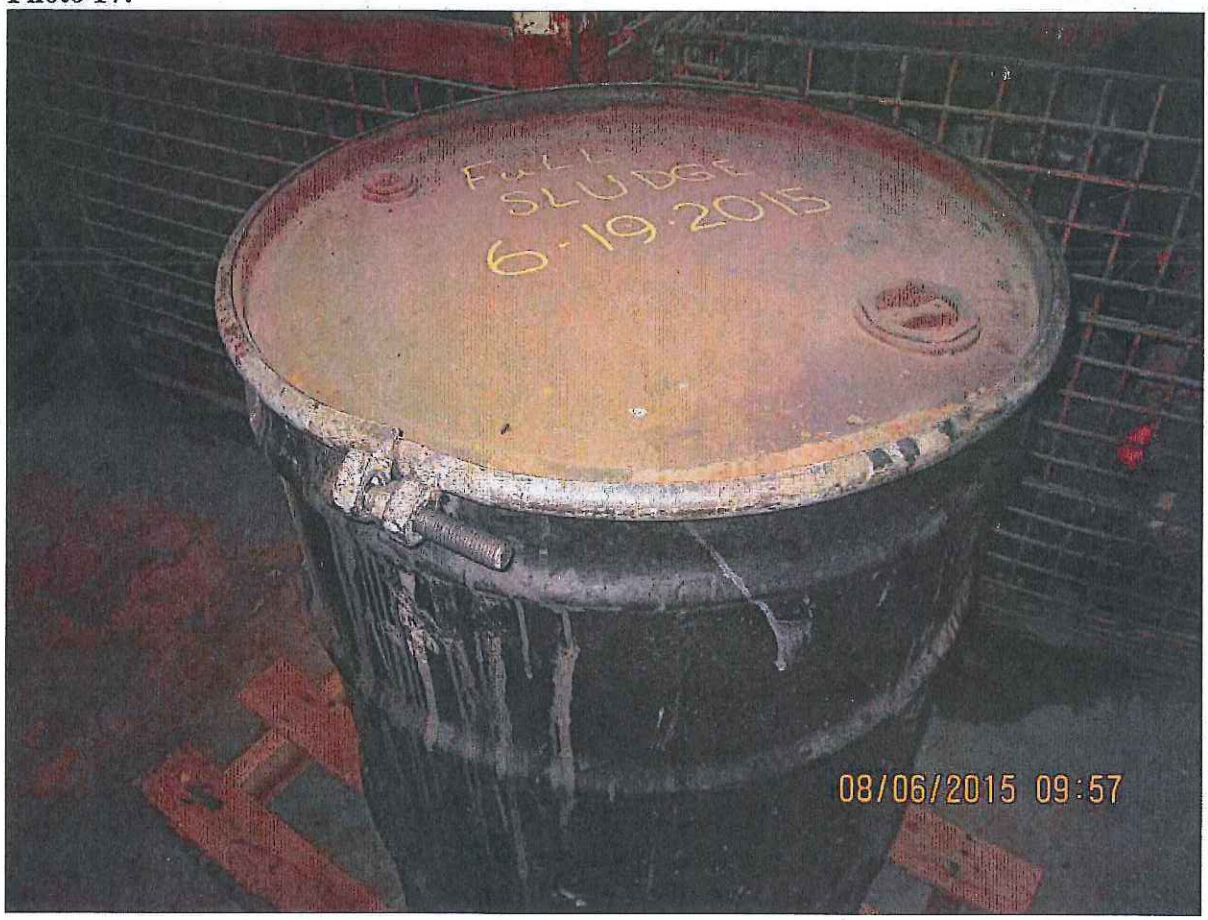


Photo 18:

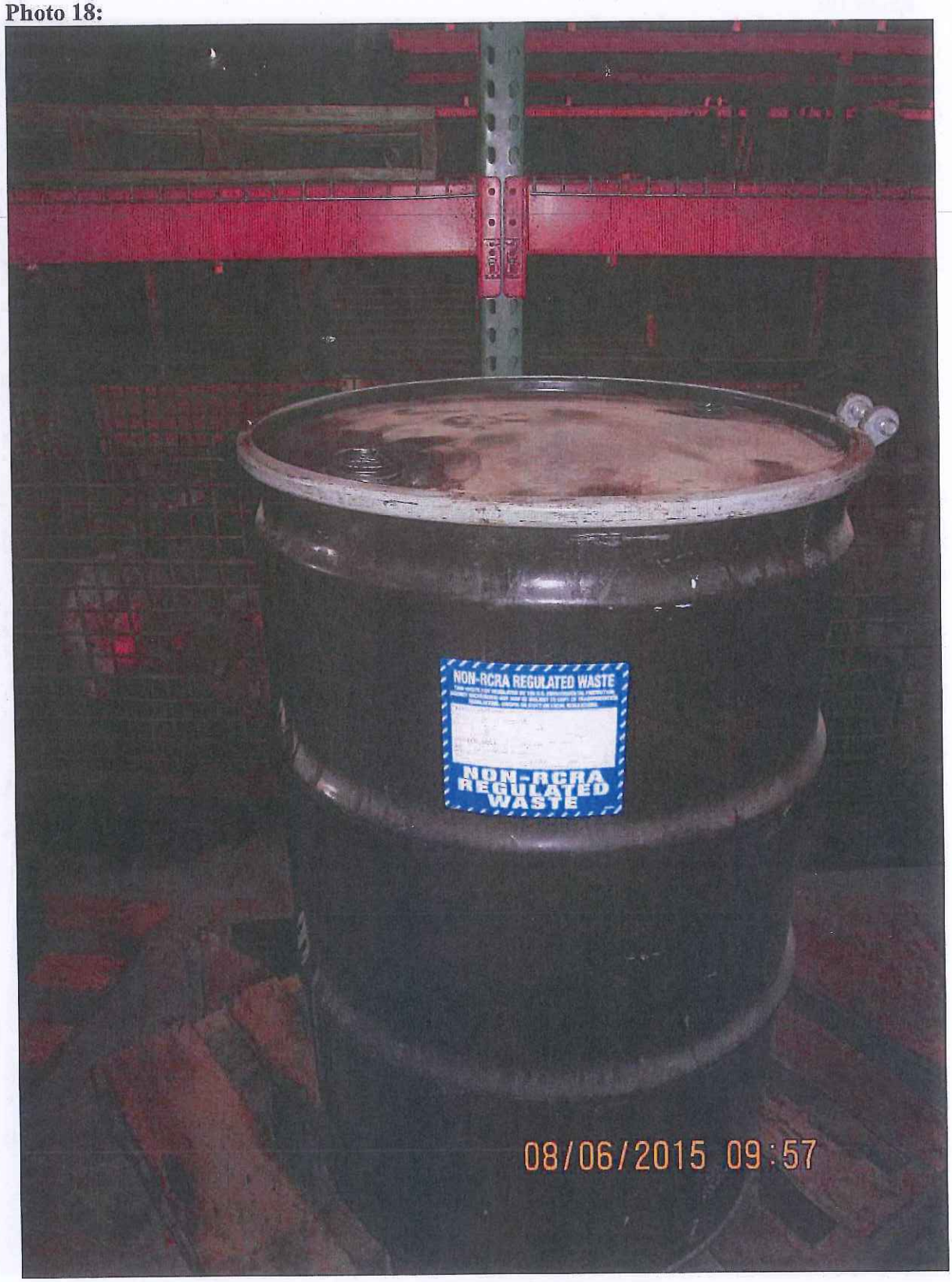
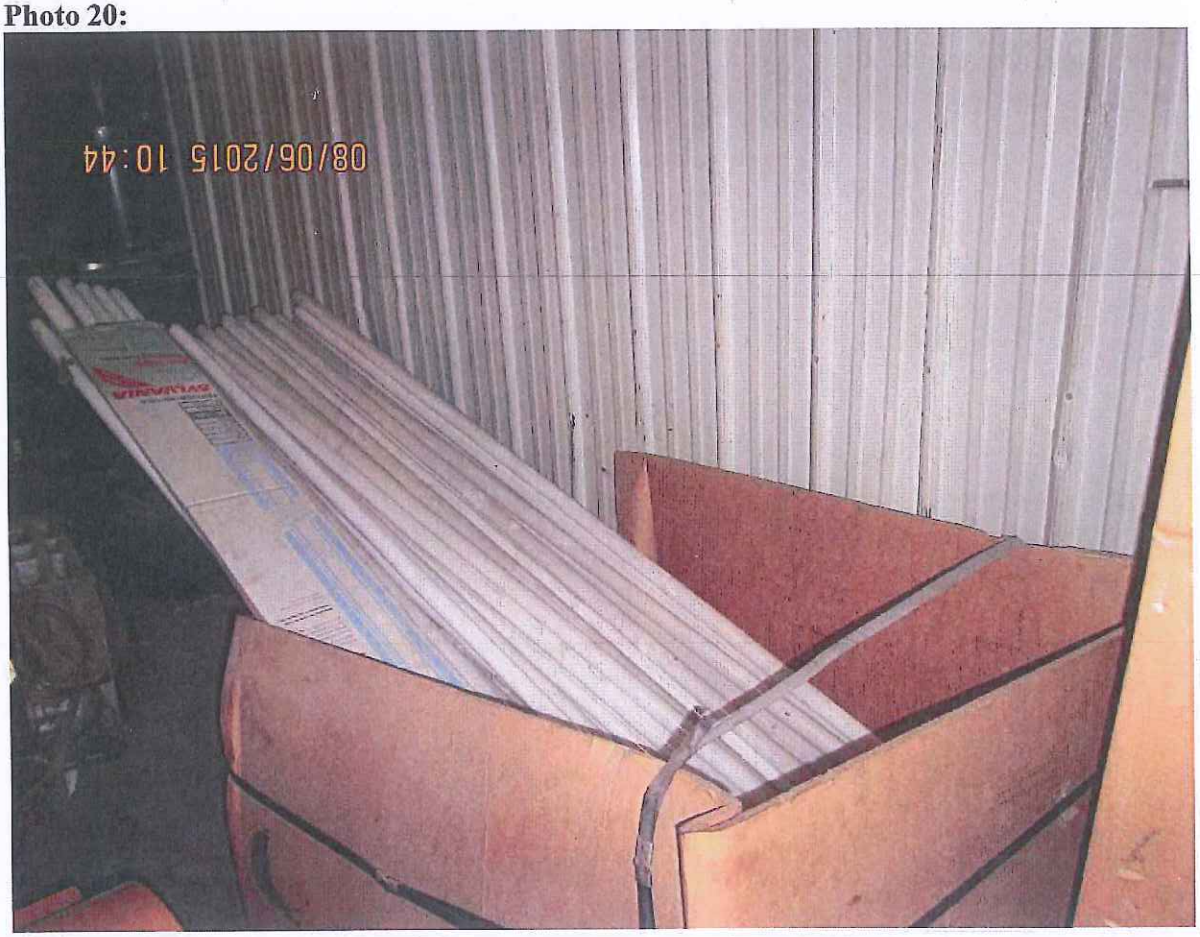
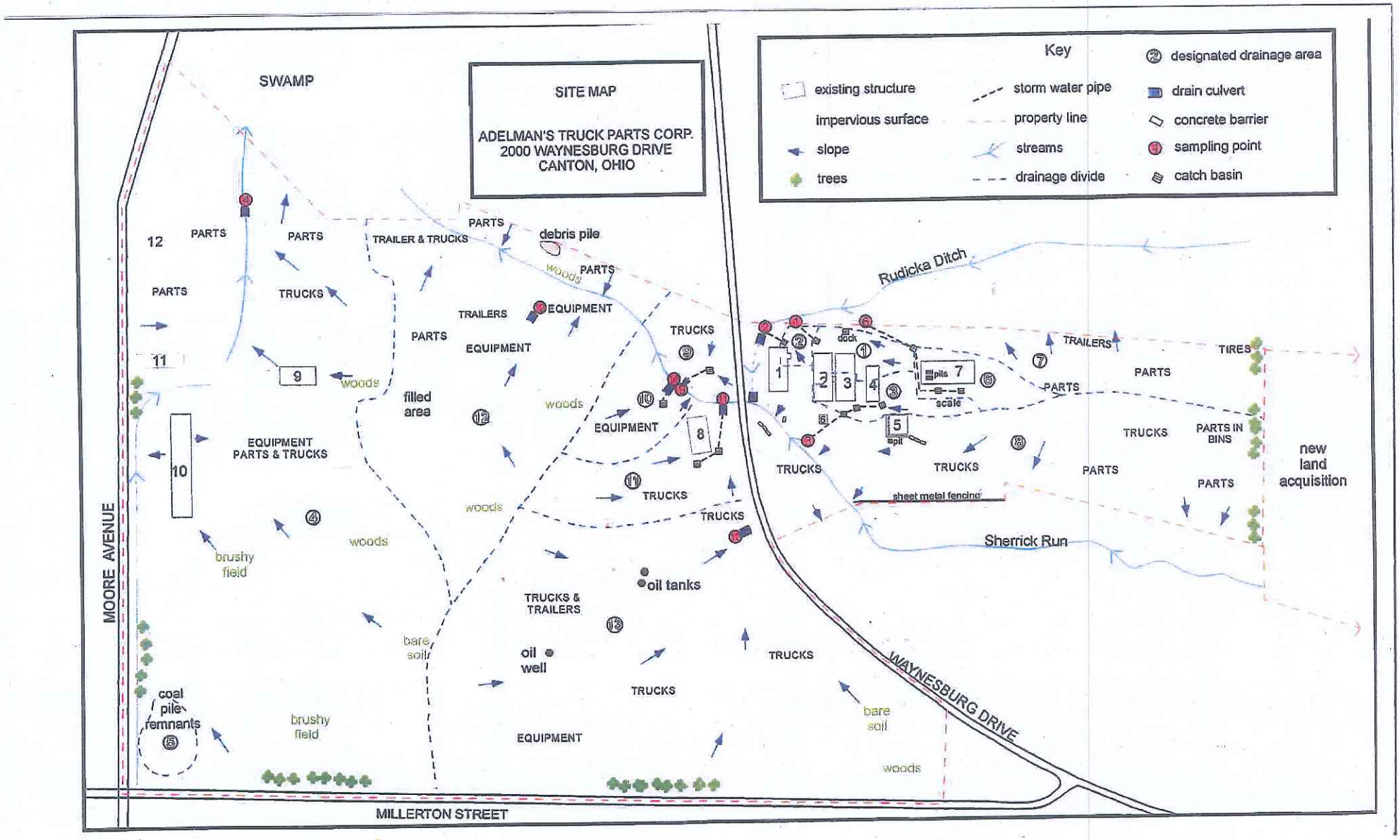

NON-RCRA REGULATED WASTE
NON-RCRA REGULATED WASTE
08/06/2015 09:57

Photo 19:

Photo 20:



ATTACHMENT B: Stormwater Management Map


SITE MAP
ADELMAN'S TRUCK PARTS CORP.
2000 WAYNESBURG DRIVE
CANTON, OHIO
Key
existing structure
impervious surface
slope
trees
storm water pipe
property line
streams
drainage divide
designated drainage area
drain culvert
concrete barrier
sampling point
catch basin
SWAMP
MOORE AVENUE
MILLERTON STREET
WAYNESBURG DRIVE
Rudicka Ditch
Sherrick Run
PARTS
TRAILER & TRUCKS
debris pile
TRUCKS
TRAILERS
EQUIPMENT
filled area
EQUIPMENT PARTS & TRUCKS
brushy field
coal pile remnants
bare soil
oil tanks
TRUCKS & TRAILERS
oil well
woods
dock
pits
scale
pit
sheet metal fencing
TIRES
PARTS IN BINS
new land acquisition

ATTACHMENT C: Inspection Checklists

BK

Adelman's Truck Parts OHD987014599 8/6/2015

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or ≤ 1 Kg. of acutely hazardous waste.
SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.
NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION			
1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Needed for blasting grit, paint booth filters, aerosol cans		Yes ☐ No ☑ N/A ☐
GENERATOR CLASSIFICATION			
2.	Does the generator produce ≤100 kg. of hazardous waste per month in accordance with 3745-51-05(A)? [conditionally exempt small quantity generator ("CESQG")] Appears to be CESQG		Yes ☑ No ☐ N/A ☐

NOTE: If quantities of hazardous waste, accumulated on-site at any one time exceed 1,000 Kg. - or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is subject to the Small Quantity Generator ("SQG") regulations. ***If so****, complete the Small Quantity Generator Requirements checklist.* If quantities of acute hazardous waste accumulated on-site at any one time exceed 1 Kg. – or the generator produces 1,000 Kg or more of hazardous waste per month, it is subject to the Large Quantity Generator ("LQG") regulations. **If so**, complete the Large Quantity Generator Requirements checklist.

OFF-SITE SHIPMENT OF HAZARDOUS WASTE			
3.	Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Xylene mixed w/ non-haz waste, taken to non-haz landfill		Yes ☐ No ☑ N/A ☐
TREATMENT OF HAZARDOUS WASTE			
4.	Does the generator treat hazardous waste in a:		
	a.	Container that meets 3745-66-70 to 3745-66-77?	Yes ☐ No ☐ N/A ☐
	b.	Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes ☐ No ☐ N/A ☐
	c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes ☐ No ☐ N/A ☐
	d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes ☐ No ☐ N/A ☐

NOTE: Complete appropriate checklist for each unit.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

MIX HAZARDOUS WASTE WITH USED OIL			
5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:		Yes ☐ No ☑ N/A ☐
	a.	Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes ☐ No ☐ N/A ☐

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Adelman's Truck Parts OHD987014594 8/6/2015

USED OIL INSPECTION CHECKLIST
GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: 1. A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.
2. Inspectors can check BUSTR's web-site at https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/PublicInquiry.asp to determine if a UST containing used oil is registered with BUSTR. Inspectors may call BUSTR at 614-752-7938 or a BUSTR site coordinator to report an unregistered UST or a UST that appears to not be in compliance with BUSTR regulations. A list of BUSTR coordinators by county are at: https://www.comapps.ohio.gov/sfm/fire_apps/bust/bustr/SearchByCounty.asp.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:		Yes ☐ No ☑ N/A ☐
	a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A ☐
NOTE: For example, used oil contaminated scrap metal stored in a pile.			
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]		Yes ☐ No ☑ N/A ☐
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?		Yes ☐ No ☐ N/A ☐

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., If generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,		Yes ☐ No ☑ N/A ☐
	a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes ☐ No ☐ N/A ☐

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes ☐ No ☐ N/A ☐

NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes ☐ No ☐ N/A ☐
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes ☐ No ☑ N/A ☐
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes ☐ No ☑ N/A ☐

Visible leaks around tanks and containers, some not labeled as "Used Oil"

9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]		Yes ☐ No ☐ N/A ☐
	a.	Stopped the release?	Yes ☑ No ☐ N/A ☐
	b.	Contained the release?	Yes ☐ No ☑ N/A ☐
	c.	Cleaned up and properly managed the used oil and other materials?	Yes ☐ No ☑ N/A ☐
	d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes ☐ No ☐ N/A ☐ Not observed / Inspected
ON-SITE BURNING IN SPACE HEATER			
10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:		
	a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes ☐ No ☐ N/A ☐
	b.	Is the heater designed to have a maximum capacity of not more that 0.5 million BTU per hour?	Yes ☐ No ☐ N/A ☐
	c.	Are the combustion gases from heater vented to the ambient air?	Yes ☐ No ☐ N/A ☐
NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).			
GENERATOR TRANSPORTATION			
11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]		Yes ☑ No ☐ N/A ☐
12.	If the generator self-transports used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]		
	a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes ☐ No ☐ N/A ☐
	b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes ☐ No ☐ N/A ☐
NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).			
COLLECTION CENTERS AND AGGREGATION POINTS			
13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]		Yes ☐ No ☐ N/A ☐
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]		Yes ☐ No ☐ N/A ☐
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]		Yes ☐ No ☐ N/A ☐
NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.			

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Adelman's Truck Parts OHD987014594 8/6/2015

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS
BATTERIES AND LAMPS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more

Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROHIBITIONS			
1.	Did the SQUWH dispose of universal waste? [3745-273-11(A)]		Yes ☐ No ☑ N/A ☐
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]		Yes ☐ No ☑ N/A ☐
WASTE MANAGEMENT AND LABELING/MARKING			
UNIVERSAL WASTE BATTERIES			
3.	Are batteries that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Leaking battery seen on site		Yes ☐ No ☑ N/A ☐
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]		Yes ☐ No ☐ N/A ☑
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]		Yes ☐ No ☑ N/A ☐
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]		Yes ☐ No ☐ N/A ☑
	a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes ☐ No ☐ N/A ☑
	b.	If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)]	Yes ☐ No ☐ N/A ☑
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)?" [3745-273-14(A)] Can be alternatively managed under 3745-266-80		Yes ☐ No ☑ N/A ☐
UNIVERSAL WASTE LAMPS			
8.	Does the SQUWH contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Open containers, not sound		Yes ☐ No ☑ N/A ☐
9.	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage, spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]		Yes ☐ No ☐ N/A ☑

*NOTE: **Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)].** A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.*

10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)] Boxes of lamps not labeled		Yes ☐ No ☑ N/A ☐
ACCUMULATION TIME			
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]		Yes ☐ No ☐ N/A ☐ Not determined
	a.	If not, is the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)]	Yes ☐ No ☐ N/A ☑
NOTE: Accumulation is defined as date generated or date received from another handler.			
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below:		Yes ☐ No ☑ N/A ☐ Unclear how long lamps had been accumulated on site
EMPLOYEE TRAINING			
13.	Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]		Yes ☐ No ☐ N/A ☐ To be determined
RESPONSE TO RELEASES			
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]		Yes ☐ No ☐ N/A ☐
15.	Is the material released characterized? [3745-273-17(B)]		Yes ☐ No ☐ N/A ☐
16.	If the material released is a hazardous waste, was it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to OAC Chapter 3745-52) [3745-273-17(B)]		Yes ☐ No ☐ N/A ☐
OFF-SITE SHIPMENTS			
NOTE: If a SQUWH self-transports waste, then the handler must comply with the Universal Waste transporter requirements.			
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]		Yes ☑ No ☐ N/A ☐
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.		Yes ☑ No ☐ N/A ☐
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)]		Yes ☑ No ☐ N/A ☐
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?		Yes ☐ No ☑ N/A ☐
	a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes ☐ No ☐ N/A ☐

21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do one of the following:		Yes ☐ No ☐ N/A ☑
	a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)]	Yes ☐ No ☐ N/A ☑
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]		Yes ☐ No ☐ N/A ☑

EXPORTS

NOTE: Small quantity handlers that export waste to the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262 subpart H. Small quantity handlers that export waste to a foreign destination other than the countries listed in 40 CFR 262.58(a)(1) are subject to 40 CFR 262.53, 40 CFR 262.56(a)(1) to (a)(4), (a)(6), and (b), 40 CFR 262.57, and 40 CFR 262 subpart E. [3745-273-20]

NOTE: Violations regarding exporting universal waste to foreign destinations should be referred to U.S. EPA Region 5 because the federal counterpart provisions are not delegable to states.